

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

WILLIAM RICHARD HULKENBERG,  
SR., et al.,

Plaintiffs,

v.

ANABAPTIST HEALTHSHARE, et al.,

Defendants.

Civil Action No. 3:19-cv-00031-GEC

**DEFENDANTS' MOTION TO  
DISMISS PLAINTIFFS' COMPLAINT**

Defendants OneShare International,<sup>1</sup> OneShare Health, LLC,<sup>2</sup> Alex Cardona, and Tyler Hochstetler, Esq. ("Defendants"), by and through their counsel and pursuant to Rules 9(b) and 12(b)(6) of the Federal Rules of Civil Procedure, hereby move for an Order dismissing Plaintiffs' Complaint for failure to state a claim upon which relief may be granted. In support of its Motion, Defendants respectfully refer to, and incorporates herein by reference, their Memorandum of Law in Support of Motion to Dismiss ("Memorandum"), filed simultaneously herewith. For the reasons stated in their Memorandum, Defendants respectfully request that the Court enter an Order dismissing Plaintiffs' Complaint in its entirety with prejudice and granting such further relief in their favor as the Court deems appropriate.

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<sup>1</sup> OneShare International was formerly known as Anabaptist Healthshare and Kingdom Healthshare International.

<sup>2</sup> OneShare Health, LLC was formerly known as Unity Healthshare, LLC and Kingdom Healthshare Ministries, LLC.

Respectfully submitted,

ONESHARE INTERNATIONAL, ONESHARE  
HEALTH, LLC, ALEX CARDONA, and TYLER  
HOCHSTETLER, ESQ.

By Counsel

s/ Marc A. Peritz

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of July, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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